

Message

From: Dykes, Teresa [Dykes.Teresa@epa.gov]
Sent: 2/17/2022 6:59:26 PM
To: King, Melanie [King.Melanie@epa.gov]; Ayres, Sara [Ayres.Sara@epa.gov]; Wortman, Eric [Wortman.Eric@epa.gov]
CC: Bird, Patrick [Bird.Patrick@epa.gov]; Sansevero, Christine [Sansevero.Christine@epa.gov]; Howlett, Careyanne [Howlett.Careyanne@epa.gov]
Subject: RE: MACT ZZZZ Compliance for OCS Source Vessels

I don't have anything special to add here other than to check the RTC or other background docs to see if we said anything about non-stationary use.

Terri Dykes
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From: King, Melanie <King.Melanie@epa.gov>
Sent: Wednesday, February 16, 2022 4:46 PM
To: Ayres, Sara <Ayres.Sara@epa.gov>; Wortman, Eric <Wortman.Eric@epa.gov>; Dykes, Teresa <Dykes.Teresa@epa.gov>
Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Sansevero, Christine <Sansevero.Christine@epa.gov>; Howlett, Careyanne <Howlett.Careyanne@epa.gov>
Subject: RE: MACT ZZZZ Compliance for OCS Source Vessels

Ex. 5 Deliberative Process (DP)

Melanie King (she/her)
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Sector Policies and Programs Division
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king.melanie@epa.gov

From: Ayres, Sara <Ayres.Sara@epa.gov>

Sent: Wednesday, February 16, 2022 3:30 PM

To: Wortman, Eric <Wortman.Eric@epa.gov>; Dykes, Teresa <Dykes.Teresa@epa.gov>

Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Sansevero, Christine <Sansevero.Christine@epa.gov>; Howlett, Careyanne <Howlett.Careyanne@epa.gov>; King, Melanie <King.Melanie@epa.gov>

Subject: RE: MACT ZZZZ Compliance for OCS Source Vessels

Ex. 5 Deliberative Process (DP)

Sara Ayres

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USEPA / OECA / OC / MAMPD

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(312) 353-6266

From: Wortman, Eric <Wortman.Eric@epa.gov>

Sent: Wednesday, February 16, 2022 1:52 PM

To: Dykes, Teresa <Dykes.Teresa@epa.gov>; Ayres, Sara <Ayres.Sara@epa.gov>

Cc: Bird, Patrick <Bird.Patrick@epa.gov>; Sansevero, Christine <Sansevero.Christine@epa.gov>; Howlett, Careyanne <Howlett.Careyanne@epa.gov>; King, Melanie <King.Melanie@epa.gov>

Subject: MACT ZZZZ Compliance for OCS Source Vessels

Hi Terri & Sara,

Ex. 5 Deliberative Process (DP)

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The requirement to comply with Subpart ZZZZ affected equipment aboard offshore vessels indicates that an owner or operator must comply with maintenance requirements (e.g., oil changes, belt checks, etc.) that are required to be completed according to hours of use or annually, whichever comes first (see 40 CFR 63.6603(c)). This time requirement presents a few challenges for interpreting the application of the rule in the offshore environment.

1. For a vessel that attaches and detaches from an OCS facility, are the hours for Subpart ZZZZ maintenance intervals to be tracked only while the vessel is connected? Once a vessel disconnects from an OCS Source, it may lose its qualification as an OCS Source Vessel and would therefore no longer be subject to Subpart ZZZZ under Permit Condition VI.B.1.

The intent of the ZZZZ regulation is to ensure proper maintenance is conducted to minimize emissions. Thus, the vessel should be in compliance with the maintenance and oil change requirements while it is operating as an OCS source. In other words, the hour meter would start when they first become an OCS source, and the maintenance requirements will need to be conducted at the appropriate intervals based on when the engine became subject to the standard (i.e. there is no starting and stopping of the clock during an intermittent OCS source status).

2. How is the annual requirement to be implemented for a vessel that only attaches for minutes at a time and for most of the time it operates it is not associated with an OCS facility? A vessel that only attaches once to an OCS Source will not have to comply with Subpart ZZZZ if it never associates with the project again, but this is not entirely clear.

If the vessel does not meet the annual requirement before the project is completed and is no longer an OCS source, then it is not required to conduct the annual maintenance. However, if the vessel will be used for other wind development projects in the future, the engine should be in compliance with the annual maintenance requirement at the time it begins operation as an OCS source.

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